

## REMARKS

Reconsideration of the present application is respectfully requested. Claims 25-27 are canceled. Claims 1, 4, 7-10, 13, 16-19, 24 and 33 have been amended. **The amendments are believed to meet the requirements of 37 CFR §1.121 or 1.4.** No claims have been newly added. No new matter has been added.

### Claim Objections

Claim 25 stands objected to because of informality. Claim 25 has been canceled. Thus, the objection is moot.

### Claim Rejections - §102(e)

Claim 28 stands rejected under 35 USC §102(e) based on Mauldin (US 6,578,048). Applicants respectfully traverse the rejections.

Claim 28 recites:

28. A method for creating a logical tree comprising:  
    **examining a first directory from a top of a directory queue**, and determining a set of children of the directory;  
    assigning an ID to the first directory;  
    examining the set of children and **determining a first subset of files and a second subset of directories**; and  
    **placing the second subset on the top of the directory queue.**  
(Emphasis added)

Mauldin does not teach or suggest the above emphasized limitations in combination. Mauldin discloses a method of constructing a catalog of files stored on a network comprised of a plurality of interconnected computers. According to Mauldin's method, a queue of files, not a directory queue, is used for constructing a catalog of files.

Regarding the limitation of "examining a first directory from a top of a directory queue", the Examiner alleges that the "file 30" discussed in column 5, lines 21-28 of Mauldin teaches or suggests the first directory from a top of a directory queue. However, a file is different from a

directory. Further, Mauldin discloses a queue of files, not a directory queue which is a queue of directories.

Because Mauldin does not teach or suggest a directory queue, Mauldin certainly does not teach or suggest determining a subset of directories from a set of children of a directory and placing the subset of directories on the top of the directory queue.

Thus, at least for the above reasons, claim 28 is not anticipated by Mauldin. Claim 28 and all claims which depend on it are patentable over Mauldin.

#### Claim Rejections - §103(a)

Claims 1-27 and 33-38 stand rejected under 35 USC §103(a) based on Kodama (US Pub. No. 20050086192) in view of Ferrel et al. (US Pat. No. 6,199,082). Applicants respectfully traverse the rejections.

Claim 1, as currently amended, recites:

1. A method for creating a file information database comprising:  
scanning a storage server having a directory structure;  
collecting data regarding the directory structure;  
assigning a first identification (ID) number to a first directory and a second ID number to a second directory in the directory structure according to a depth first search (DFS) order; and  
**writing a data structure including the first ID number, the second ID number and a relation between the first directory and the second directory.**  
(emphasis added)

In contrast, Kodama and Ferrel, individually or in combination, do not teach or suggest the above emphasized limitation.

Kodama discloses a search engine parsing files stored among one or more file servers in order to create and maintain index information used by the search engine to perform searches (Abstract). Specifically, as defined in Kodama's paragraph [0027], "the specific content and structure of the information comprising an index," an index is different from an identification number. Even assuming *arguendo* that an index may be considered as an

identification number, throughout the discussion of Kodama, the index information is created and associated to files, not to directories, such as recited in claim 1.

Even assuming *arguendo* that an index may be considered as an identification number and that a file may be considered as a directory, Kodama does not teach or suggest a data structure including the first ID number, the second ID number and a relation between the first directory and the second directory, such as recited in claim 1. The index information disclosed in Kodama at least does not contain the information regarding a relation between a first file and a second file.

Ferrel also does not teach or suggest the above emphasized limitation. Neither does the Examiner contend so. Thus, at least for the foregoing reasons, Kodama and Ferrel, individually or in combination, do not teach or suggest each and every limitation of claim 1. Claim 1 and all claims which depend on it are patentable over the cited art.

Independent claim 10, as currently amended, recites limitation similar to that discussed above for claim 1. For similar reasons, claim 10 and all claims which depend on it are patentable over Kodama and Ferrel.

Independent claim 19 recites an agent to assign identification (ID) numbers in a DFS manner to the directories, wherein the information at least indicates relations among the directories, and a database server to store the information and the ID numbers. This limitation of claim 19 is similar to that discussed above for claim 1. Thus, similar reasons, claim 19 and all claims which depend on it are patentable over Kodama and Ferrel.

Independent claim 33 recites the limitations of collecting data regarding a directory structure, wherein the directory structure indicates a plurality of relations among a plurality of directories, assigning an identification (ID) number to a directory of the plurality of directories according to a DFS order and writing a table including the ID number and the data. This limitation of claim 33 is similar to that discussed above for claim 1. Thus, for similar reasons, claim 33 and all claims which depend on it are patentable over Kodama and Ferrel.

Conclusion

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: May 4, 2007

  
Jordan M. Becker  
Reg. No. 39,602

Customer No. 48102  
12400 Wilshire Blvd.  
Seventh Floor  
Los Angeles, CA 90025  
(408) 720-8300